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KEVIN STOCK
COUNTY CLERK
NO: 20-2-04397-0

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THE COUNTY OF PIERCE

LISA C. ARNETTE,

vs.

Plaintiff,

NO.

WALMART, INC., a foreign profit
corporation,

Defendant.

COMPLAINT FOR DAMAGES

COMES NOW the plaintiff, LISA C. ARNETTE, by and through her attorney of record, The Law Offices of J. Michael Koch & Associates, and claims against the defendant as follows:

I. JURISDICTION AND VENUE

- 1.1 The parties and subject matter herein are subject to the jurisdiction of this Court.
- 1.2 The defendant, WALMART, INC., is a foreign profit corporation,
conducting business in Pierce County, State of Washington.
- 1.3 Venue is appropriate under RCW 4.12.025 (1).

II. STATUS OF THE PARTIES

- 2.1 The plaintiff, LISA C. ARNETTE, was at all times material to this complaint a resident of Kitsap County, State of Washington.

COMPLAINT FOR DAMAGES - 1

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Silverdale, WA 98383
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1 2.2 The defendant, WALMART, Inc., was at all times material to this complaint, a foreign
2 profit corporation, conducting business in Pierce County, State of Washington.
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III. FACTS

4 3.1 On January 1, 2018, plaintiff, LISA C. ARNETTE, was a customer at defendant,
5 WALMART, INC., store located at 6797 State Highway 303 NE, Bremerton,
6 Washington.
7

8 3.2 As plaintiff, LISA C. ARNETTE, attempted to enter the defendant, WALMART store,
9 she suddenly and without warning, was tripped by an unsafe floor surface and fell to the
10 floor.

11 3.3 Plaintiff, LISA C. ARNETTE, fell hard unto the floor of the defendant, WALMART
12 Store, and suffered severe injuries.
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IV. CAUSE OF ACTION

14 4.1 The plaintiff, LISA C. ARNETTE, hereby incorporates all allegations of paragraph 1.1
15 through 3.3 as though fully set forth herein.
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17 4.2 The defendant, WALMART, Inc., owed a duty to plaintiff, LISA C. ARNETTE, to
18 maintain their premises in a reasonably safe condition, and failed to do so.
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20 4.3 Defendant, WALMART, Inc., breached its duty to plaintiff, LISA C. ARNETTE, by
21 acting negligently in the following manner:
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23 a) failing to exercise ordinary care to correct a hazardous condition; and
24 b) failing to exercise ordinary care to warn of a hazardous condition; and
25 c) failing to provide safe premises for their business invitees; and
26 d) being otherwise negligent.
27

V. DAMAGES

5.1 As a direct and proximate cause of the negligent conduct of defendant, WALMART, INC., the plaintiff, LISA C. ARNETTE, has sustained:

- a) bodily injuries and disability, the full extent and nature of which will be shown at the time of trial; and
- b) medical and injury related expenses incurred to date and to be incurred in the future, the full extent and nature of which will be shown at the time of trial; and
- c) loss of earning capacity, the extent of which will be shown at the time of trial; and
- d) emotional distress, pain and suffering, past, present, and future, the full extent and nature of which will be shown at the time of trial; and
- e) loss of enjoyment of life, the full extent and nature of which will be shown at the time of trial; and
- f) general damages which will fully and fairly compensate plaintiff for the nature and extent of injuries and damages in an amount which will be shown at the time of trial.

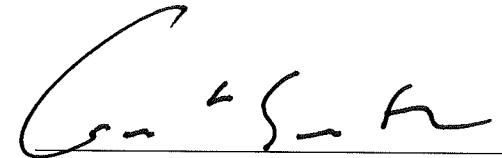
VI. DEMAND FOR RELIEF REQUESTED

WHEREFORE. Plaintiff prays for judgment as follows:

1. For Plaintiff's special and general damages in a sum to be proven at the time of trial; and
2. For Plaintiff's statutory fees, taxable costs and disbursements herein; and

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3 3. For such other and further relief, as to the Court shall deem equitable in the premises.
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DATED this 27 day of January, 2020.



Grant Smith, WSBA# 24676
Attorney for Plaintiff